

# **Exhibit C**

**From:** Alexander Loftus <alex@loftusandeisenberg.com>  
**Sent:** Tuesday, October 28, 2025 10:43 AM  
**To:** AJ Johnson <AJohnson@krcl.com>  
**Cc:** Christopher C. Pappas <cpappas@krcl.com>; Dennis Duffy <DDuffy@krcl.com>  
**Subject:** Re: HMAS/Woodbright - your proposed motion

I'll indicate this motion is opposed.

I've been in contact with AUSA for months now. How do you think they were able to move so fast?

The DOJ has no role in a civil case and doesn't have capacity now to initiate one. A receivership is necessarily civil. We are asking appoint people who usually work with the DOJ to run it and hit the ground hard and fast while the government catches up the two work hand in glove.

-Alex

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**From:** AJ Johnson <[AJohnson@krcl.com](mailto:AJohnson@krcl.com)>

**Sent:** Tuesday, October 28, 2025 9:58:39 AM

**To:** Alexander Loftus <[alex@loftusandeisenberg.com](mailto:alex@loftusandeisenberg.com)>

**Cc:** Christopher C. Pappas <[cpappas@krcl.com](mailto:cpappas@krcl.com)>; Dennis Duffy <[DDuffy@krcl.com](mailto:DDuffy@krcl.com)>

**Subject:** RE: HMAS/Woodbright - your proposed motion

That is not true. The proposed motion is not unopposed. You need to talk to the AUSA, who can guide you given the pending criminal case. You can state in the certificate:

Defense counsel advise that the motion is not unopposed for the following reason: Defense counsel have stated that they cannot address the issue in the motion, given the pending criminal matter, which is reportedly under seal. Defense counsel advised that the Assistant United States Attorney in charge of the criminal matter is the only person who should/can address the issue with Plaintiff's counsel.

ANDREA M. JOHNSON

Director



Kane Russell Coleman Logan PC

5151 San Felipe Street | Suite 800 | Houston, Texas 77056

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KANE RUSSELL COLEMAN LOGAN PC

2025

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**From:** Alexander Loftus <[alex@loftusandeisenberg.com](mailto:alex@loftusandeisenberg.com)>

**Sent:** Tuesday, October 28, 2025 9:48 AM

**To:** AJ Johnson <[AJohnson@krcl.com](mailto:AJohnson@krcl.com)>

**Cc:** Christopher C. Pappas <[cpappas@krcl.com](mailto:cpappas@krcl.com)>; Dennis Duffy <[DDuffy@krcl.com](mailto:DDuffy@krcl.com)>

**Subject:** Re: HMAS/Woodbright - your proposed motion

I appreciate that. Can I indicate this is unopposed?

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**From:** AJ Johnson <[AJohnson@krcl.com](mailto:AJohnson@krcl.com)>

**Date:** Tuesday, October 28, 2025 at 9:46 'a0AM

**To:** Alexander Loftus <[alex@loftusandeisenberg.com](mailto:alex@loftusandeisenberg.com)>

**Cc:** Christopher C. Pappas <[cpappas@krcl.com](mailto:cpappas@krcl.com)>, Dennis Duffy <[DDuffy@krcl.com](mailto:DDuffy@krcl.com)>

**Subject:** HMAS/Woodbright - your proposed motion

Alex,

I am sorry but I cannot talk with you today about the matter that you raised (the receivership). While I know you have had difficulty getting through to the government, the AUSA is really the only person who can address your proposed receivership motion, given the pending criminal matter.

Regards,

AJ

ANDREA M. JOHNSON

Director



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